

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

DRESSER-RAND COMPANY,

Plaintiff,

-against-

PETRÓLEOS DE VENEZUELA, S.A. and
PDVSA PETRÓLEO, S.A.,

Defendants.

Docket No.: 1:19-cv-002689-LLS

**NOTICE OF DEFENDANT
PETRÓLEOS DE
VENEZUELA, S.A.'S
MOTION FOR ISSUANCE
OF LETTERS OF REQUEST**

PLEASE TAKE NOTICE that upon the accompanying Memorandum in Support of Defendant Petróleos de Venezuela, S.A.'s Motion for Issuance of Letters of Request, the Declaration of Robin Muir in Support of Defendant Petróleos de Venezuela, S.A.'s Motion for Issuance of Letters of Request, and all proceedings and pleadings in this action, defendant Petróleos de Venezuela, S.A., by and through its undersigned counsel, will move this Court, the United States District Court for the Southern District of New York, at the courthouse thereof, located at 40 Foley Square, New York, New York 10007, before the Honorable Louis L. Stanton, for: (1) issuance of letters of request for international judicial assistance, pursuant to 28 U.S.C. § 1781 and Chapter I of the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, March 18, 1970, T.I.A.S. No. 7444, 23 U.S.T. 2555, in the forms annexed hereto as Exhibits 1-3, to obtain discovery from non-party foreign entities: (a) Dinosaur Merchant Bank Ltd., (b) China CITIC Bank, and (c) Commerzbank AG; and (2) such other and further relief as the Court deems just and proper.

Dated: August 27, 2020

Respectfully submitted,

HOGAN LOVELLS US LLP

/s/ Dennis H. Tracey, III

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